

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

ROSY GIRON DE REYES, *et al.*,

Plaintiffs,

v.

WAPLES MOBILE HOME PARK
LIMITED PARTNERSHIP, *et al.*,

Defendants.

Civil No.: 1:16cv00563-TSE-TCB

**CONSENT MOTION TO RESCHEDULE
FINAL PRETRIAL CONFERENCE**

Plaintiffs Rosy Giron De Reyes, Jose Dagoberto Reyes, Felix Alexis Bolanos, Ruth Rivas, Yovana Jaldin Solis, Esteban Ruben Moya Yrapura, Rosa Elena Amaya, and Herbert David Saravia Cruz (“Plaintiffs”), and Defendants Waples Mobile Home Park Limited Partnership, Waples Project Limited Partnership, and A. J. Dwoskin & Associates, Inc. (collectively “Defendants”), by counsel, respectfully submit this Joint Motion to Extend Final Pretrial Conference.

On April 18, 2017, the Court issued an Order (Dkt. 191) which, among other things, set the final pretrial conference date for 10:00 a.m. on Friday, April 28, 2017. The parties then reached an agreement in principle to resolve the remaining claims pending in the above-captioned action.

On April 27, 2017, the parties requested (Dkt. 192), and the Court granted (Dkt. 193) a brief extension of the final pretrial conference to May 12, 2017, by which time the parties hoped to have filed their stipulation of dismissal. Since then, the parties have finalized a settlement agreement, but they require additional time to obtain the necessary signatures before filing their

stipulation of dismissal. Accordingly, the parties respectfully request a one-week extension of the final pretrial conference from May 12, 2017 to May 19, 2017.

The parties hereby waive oral argument on this motion and request that the Court rule upon the motion without a hearing pursuant to Local Civil Rule 7(J).

A proposed Order is attached.

DATED May 10, 2017

Respectfully submitted,

/s/ Paul Brinkman

QUINN EMANUEL URQUHART &
SULLIVAN, LLP
Paul Brinkman, VSB # 35950
Ariel Wade Trajtenberg (*pro hac vice*)
Joy Odom, VSB # 84281
Archith Ramkumar (*pro hac vice*)
Diego Duran de la Vega (*pro hac vice*)
Jongwook Kim (*pro hac vice*)
777 Sixth Street NW, 11th Floor
Washington, District of Columbia 20001
Phone: (202) 538-8000
Fax: (202) 538-8100
paubrinkman@quinnmanuel.com
arieltrajtenberg@quinnmanuel.com
archithramkumar@quinnmanuel.com
joyodom@quinnmanuel.com
diegoduran@quinnmanuel.com
wookiekim@quinnmanuel.com

/s/ Michael S. Dingman

REED SMITH LLP
Grayson P. Hanes, VSB # 06614
Michael S. Dingman, VSB # 30031
Justin deBettencourt, VSB # 83806
7900 Tysons One Place
Suite 500
McLean, Virginia 22102
Phone: (703) 641-4200
Fax: (703) 641-4340
ghanes@reedsmith.com
mdingman@reedsmith.com
jdebettencourt@reedsmith.com

Counsel for Defendants

LEGAL AID JUSTICE CENTER

Simon Sandoval-Moshenberg, VSB #77110
Rebecca Wolozin, VSB #89690
6066 Leesburg Pike, Suite 520
Falls Church, VA 22041
Phone: (703) 778-3450
Fax: (703) 778-3454
simon@justice4all.org
becky@justice4all.org

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on the 10th day of May, 2017, I filed the foregoing Consent Motion to Reschedule Final Pretrial Conference electronically with the Clerk of the Court using the ECF system, and caused to be served by electronic mail a copy of the foregoing document upon the following parties:

Grayson P. Hanes, VSB #06614
Michael S. Dingman, VSB #30031
Justin deBettencourt, VSB #83806
REED SMITH LLP
7900 Tysons One Place, Suite 500
McLean, Virginia 22102
Phone: (703) 641-4200
Fax: (703) 641-4340
ghanes@reedsmith.com
mdingman@reedsmith.com
jdebettencourt@reedsmith.com

Counsel for Defendants

/s/ Paul Brinkman

QUINN EMANUEL URQUHART &
SULLIVAN, LLP
Paul Brinkman, VSB # 35950

777 Sixth Street NW, 11th Floor
Washington, District of Columbia 20001-3706
Phone: (202) 538-8000
Fax: (202) 538-8100
paulbrinkman@quinnemanuel.com

Counsel for Plaintiffs